

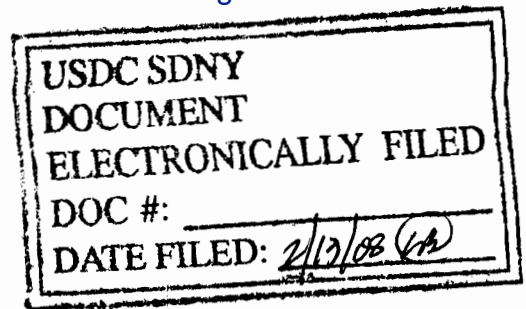
MICHAEL A. CARDOZO  
Corporation Counsel

CHAMBERS OF  
JUDGE SIDNEY H. STEIN  
U.S.D.J.

100 CHURCH STREET  
NEW YORK, N.Y. 10007



THE CITY OF NEW YORK  
LAW DEPARTMENT



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Assistant Corporation Counsel  
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February 11, 2008

BY HAND

Honorable Sidney H. Stein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Escalet v. City of New York, et al., 08 CV 96 (SHS)

Dear Judge Stein:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and the supervising attorney for defendant City of New York ("City") in the above-referenced matter.<sup>1</sup> I am writing with the consent of plaintiff's counsel, Andrew F. Plasse, Esq., to respectfully request a sixty-day enlargement of time, from February 11, 2008 to April 14, 2008 within which defendant City may answer or otherwise respond to the complaint and for a corresponding adjournment of the initial conference currently scheduled for March 21, 2008 at 10:00 a.m. to a date after the City has responded to the complaint.<sup>2</sup> No previous request for an extension has been made by defendant City.

The complaint alleges, inter alia, that plaintiff was subjected to false arrest and excessive force. In addition to the City of New York, the complaint purports to name "Police Officers John Does 1-3 in their individual and official capacities as Police Officers employed by the City of New York" as defendants. Before this office can adequately respond to the complaint, we will need to conduct an investigation into the facts of the case. The enlargement of time will afford us the opportunity to investigate the matter.

<sup>1</sup> This case has been assigned to Assistant Corporation Counsel Bradford C. Patrick, who is presently awaiting admission to the bar and is handling this matter under supervision. Mr. Patrick may be reached directly at (212) 788-1575.

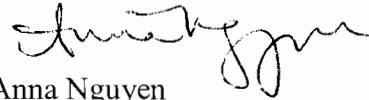
<sup>2</sup> I also respectfully note that I will be engaged in trial preparation on that date for the trial of Sutton v. City of New York, et al., 05 CV 1215 (JFB)(JMA), which is scheduled to begin on March 24, 2008 before the Honorable Joseph F. Bianco in the Eastern District of New York.

In view of the foregoing, it is respectfully requested that the Court grant the within request extending defendant City's time to answer or otherwise respond to the complaint *is extended* until April 14, 2008 ~~and granting a corresponding adjournment of the initial conference currently~~ *and the* ~~scheduled for March 21, 2008 to a date after the City has responded to the complaint.~~ *initial material*

Thank you for your consideration in this regard.

*Conference is adjourned to 4/25/08, at 10:30 a.m.*

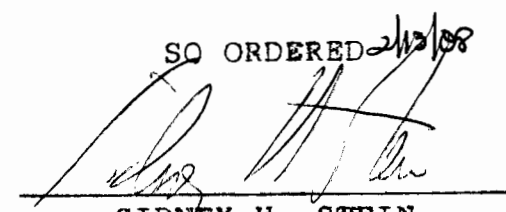
Respectfully submitted,



Anna Nguyen  
Assistant Corporation Counsel  
Special Federal Litigation Division

cc: BY FAX AT (212) 402-7737  
Andrew F. Plasse  
Attorney for Plaintiff  
352 7<sup>th</sup> Avenue, Suite 402  
New York, NY 10001

SO ORDERED *2/13/08*

  
\_\_\_\_\_  
SIDNEY H. STEIN  
U.S.D.J.